



U.S. Department of Justice

United States Attorney
Southern District of New York

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

October 27, 2020

BY CM/ECF

The Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Pedro Ramos*, 20 Cr. 478 (RMB)

Dear Judge Berman:

The Government writes with the consent of defense counsel to request a 60-day of the pretrial conference, currently scheduled for October 28, 2020, at 9:00 a.m. via teleconference. The Government also seeks an exclusion of time under the Speedy Trial Act until the date of the next conference.

Defendant Pedro Ramos was arrested on July 23, 2020, and charged by Complaint for conspiring to possess with intent to distribute cocaine, in violation of 21 U.S.C. § 846. Dkt. No. 1 (the "Complaint"). As set forth in the Complaint, Ramos was charged for transporting approximately ten kilograms of cocaine from Texas to New York in a vehicle with concealed compartments. On September 14, 2020, a grand jury returned an indictment charging Ramos with one count of violating 21 U.S.C. § 846. Dkt. No. 7.

On or about October 26, 2020, the Government produced the bulk of discovery in this matter, which included DEA reports, photographs, search warrants, and search warrant returns. The Government believes additional discovery will be forthcoming – namely, the contents of electronic devices – and will produce that discovery promptly when it is available.

Because discovery was only recently produced, the Government, with the consent of defense counsel, seeks an adjournment of the pretrial conference in this matter for 60-days.¹ This will permit the defendant and defense counsel additional time to review discovery, and the Government additional time to gather any outstanding discovery.

The Government requests an order excluding time under the Speedy Trial Act until the date of the next conference in this matter. The ends of justice are served by excluding time because it will permit the defendant and his counsel time to review the discovery under challenging

¹ However, if the Court would like to proceed on October 28, 2020, the parties are available and can proceed.

Thank you for your consideration of this matter.

AUDREY STRAUSS
Acting United States Attorney

by: _____
Kedar S. Bhatia
Assistant United States Attorney
(212) 637-2465

Richard M. Berman
Richard M. Berman, U.S.D.J.